Message

From: Morrie Lee [ml90@chrysler.com]

Sent: 12/11/2012 3:58:56 PM

To: Dalton, Joel [/o=ExchangeLabs/ou=Exchange Administrative Group

(FYDIBOHF23SPDLT)/cn=Recipients/cn=5e590ca117f84cc384adcf13b68b4358-Dalton, Joel]

Subject: Diesel Regen response

Joel:

Regen is infrequent. Some average mileage numbers between regen cycles versus the type of driving

are:

Hwy only driving – 485 miles City only driving – 150 miles Denver city only driving – 360 miles

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260 CIMS: 422-01-11

e-mail: ML90@Chrysler.com

From: Dalton.Joel@epamail.epa.gov [mailto:Dalton.Joel@epamail.epa.gov]

Sent: Monday, December 10, 2012 9:04 AM

To: Morrie Lee

Subject: RE: MIL on a test vehicle

Morrie -

Meeting in 4 min.

I took your question to the people dealing with diesels last week and discussed it. Consensus was that this should not be a problem as long as forcing this regen is not masking an unusually short time between periods. If the regen is a "rare" event and this procedure is simply to avoid the unlucky occurrence of a regen during the test, no problem. If the vehicle can barely run a test or two without regen, then forcing it to regen outside the test sequence to avoid regen during the test is creating a non-representative situation, or hiding the fact that it regens often, etc.

This was the feedback I received. I am absolutely assuming regen is "rare" and therefore the proposal is not an issue. But can you quantify this or otherwise confirm the assumption - how often does it regen?

Joel Dalton US Environmental Protection Agency 734.214.4579 From: Morrie Lee <mi90@chrysler.com>
To: Joel Dalton/AA/USEPA/US@EPA
Date: 12/07/2012 10:32 AM
Subject: RE: MIL on a test vehicle

Joel:

I need something more definitive. I was asked if "should not be a problem" means that we have approval. Do you approve: "our 70 mph regen added before the prep cycle" and support this at your lab when it comes time to confirm.

Morrie Lee

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From: <u>Dalton.Joel@epamail.epa.gov</u> [<u>mailto:Dalton.Joel@epamail.epa.gov</u>]

Sent: Thursday, December 06, 2012 2:05 PM

To: Morrie Lee

Subject: RE: MIL on a test vehicle

Okay, thanks.

RE: forced regen during prep to avoid regen during cycle test - should not be a problem, but please tell us what the "normal" regen frequency is and also, does the vehicle employ any "opportunistic regen"? In other words, what are the parameters that determine when it does regen? In the field under normal operation, would the time/miles between regen ever happen somewhat earlier than needed because conditions are ripe for it so it "pre-emptively" regens?

In a nutshell - what are the entry conditions to regen and/or the limits to prevent frequent regen?

Joel Dalton
US Environmental Protection Agency
734.214.4579

From: Morrie Lee Morrie Lee Morrie Lee Morrie Lee Morrie Lee Morrie Lee Morrie Lee <a href="M900ch

It's our 500L which is the larger sibling to the 500. Thanks for checking,.

From: <u>Dalton.Joel@epamail.epa.gov</u> [mailto:Dalton.Joel@epamail.epa.gov]

Sent: Wednesday, December 05, 2012 5:44 PM

To: Morrie Lee

Subject: Re: MIL on a test vehicle

That sounds reasonable to me, especially if there is precedence and we can see what the code is. That said, I will have to confirm with the lab and other powers that our policy (still) allows this.

Which vehicle is this? JD Joel Dalton US Environmental Protection Agency 734.214.4579

From: Morrie Lee <ml90@chrysler.com>
To: Joel Dalton/AA/USEPA/US@EPA
Date: 12/05/2012 03:44 PM
Subject: MIL on a test vehicle

We have a vehicle where we cannot get Fiat to deactivate a MIL due to rolls mode. There is no rolls mode to be set. We pull the pump fuse to bypass ABS and FIAT controls the abs system of the vehicle.

In the past, when asked, EPA has been agreeable to allow us to run with a MIL (when explained that it is not emissions related). Do you concur?

Morrie Lee Manager - Emissions Certification Assurance Chrysler Group LLC

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